Stock feeding advice for drought periods

Livestock producers have a legal responsibility to ensure livestock, and livestock producing milk for human consumption, do not have unacceptable levels of agvet chemicals/heavy metals and that restricted animal material is not fed to livestock.

During drought periods, residue risks can be significantly increased as it may become necessary to buy feed and fodder from new and different sources, alternative types of feed and fodder not typically used for livestock might be sourced and feed or fodder might be sourced from failed crops not originally intended as livestock feed.

Producers should also ensure rubbish dumps and machinery storage areas are fenced off to prevent livestock access e.g. lead exposure from access to batteries and discarded oil and discarded chemical containers of various sorts.

This fact sheet outlines:

- Regulatory requirements for producers on agvet residues in meat and livestock products (such as milk).
- Regulatory requirements relating to the feeding of restricted animal material (RAM).
- Details on the steps that can be taken to minimise the potential risks posed with stock feed in drought periods.
Maximum Residue Limits

Maximum Residue Limits (MRLs) are set for various agricultural and veterinary chemicals in food commodities.

Food commodities (such as meat products or milk) that are found to contain agvet residues exceeding MRLs may be condemned without payment to the producers.

It could also lead to significant trade risks and financial losses to producers through lost markets and/or increased regulatory requirements for residue testing.

Meat and livestock products are tested for agvet residues from both targeted and random sampling programs in Australia and in residue testing programs conducted by our export markets.

Many of Australia’s trading partners have not set MRLs for some of the agvet chemicals commonly used in Australian agriculture, or may have set MRLs at levels lower than those that apply in Australia.

Where trading partners have no set MRL for a particular chemical, there must be no detectable residue of that chemical in exported products.

When agvet residues are detected in an NRS residue sample or are reported by a trading partner, Biosecurity SA routinely conducts a traceback process to identify the property the product originated from and investigate the chemical use and any relevant chemical use declarations relating to the cause of the residue violation.

Varying regulatory responses can be applied dependent on investigation findings.
National vendor declarations

Australia’s livestock industry requires producers to supply National Vendor Declarations (NVDs) to confirm the chemical exposure history of livestock and to identify chemical residue risks to manage potential product markets.

The NVDs ask questions about the feeding and chemical treatment history of stock offered for sale or slaughter.

It is critical the explanatory notes are read carefully and the forms completed accurately as false or misleading information on NVDs can result in prosecution and/or civil liability.

Cattle and sheep NVDs include questions about the feeding of any pasture, crops, stubble, grain or fodder treated with an agricultural chemical in the 60 days prior to harvest or first grazing.

Producers selling stock within 60 days of feeding materials with an unknown chemical treatment history should check the explanatory notes before completing their answer to question seven on the Cattle NVD or question five on the Sheep NVD.

Question four on the cattle NVD also asks if by-product stock feeds have been fed within the 60 days prior to sale. Producers who have fed materials not primarily produced for livestock consumptions in the 60 days prior to sale must answer ‘yes’ to this question.

The by-products covered by this question include waste fruit, vegetable and fibre crops, which can be in the form of peel, pulp, pressings, stem and leaf material.
Withholding Periods

A Withholding Period (WHP) can be defined as the minimum period of time that must elapse between the last application of an agricultural or veterinary (agvet) chemical product, and the 'use' of the agricultural produce to which the chemical was applied.

For animal treatments, the WHP on the label is the minimum time that must elapse between treatment and the slaughter of the animal, or the collection of its milk for human consumption.

Agricultural crop chemicals may have different withholding periods for harvest and for grazing/fodder purposes. It is critical producers are aware of these WHP by reading the label if they are using crops or fodder they have produced for stock feed or are supplying crops or fodder from crops for stock feed.

It is also critical to note that the WHP applies from the time of harvest, which for windrowed crops or cut hay is the day the crop was windrowed or cut for hay.

WHP statements are found on many chemical product labels within or below the Directions for Use table.

Export Slaughter Intervals

The livestock industry has established Exports Slaughter Intervals (ESIs) for a range of veterinary drugs and pesticides used on livestock. ESIs are essentially longer withholding periods that aim to ensure livestock products comply with some key trading partner MRLs.

Information on ESIs is provided on NVDs for cattle and sheep. A list of ESIs are available from the Australian Pesticides and Veterinary Medicines Authority (APVMA) website (apvma.gov.au).
Managing failed crops and hay cut for drought feeding

Broadacre crops that were not originally intended for livestock but failed (e.g. due to frost or a poor finish in drought conditions) can become a potential stock food source and can be a high risk for residues.

Lengthy withholding and grazing periods, particularly with regard to the application of some fungicides, are especially of concern.

In instances when a feed shortage is occurring or the crop must be cut for hay to ensure quality, feeding to livestock that are to be retained on-farm may be an option.

If decisions need to be revised regarding retaining these animals, producers must consider the implications of this. On-farm quality controls needs to be in place to avoid accidental feeding of hay that is within the withholding period to livestock destined for slaughter.

Similarly, producers who are purchasing hay from failed broadacre crops need to be requesting appropriate supporting documentation from the vendor to ensure they know the status of the feed they are purchasing.

Managing conventional stock feeds/Commodity Vendor Declarations failed crops and hay cut for drought feeding

If you are using stockfeed grown from your own property, ensure WHPs and ESIs have been followed and that accurate and correct declarations are made on the NVDs.

If you are buying in stockfeed, request a commodity vendor declaration (CVD) form prior to confirming the purchase.

CVDs detail the chemical treatments applied to the feed to allow you to identify potential residue risks. If your stockfeed supplier is not familiar with a CVD, ask them to download a CVD form the Meat and Livestock Australia website (www.mla.com.au) and complete the applicable details.
In the absence of a CVD, producers need to assess the residue risk (and keep a record of this assessment) or have a feed sample tested for residues.

This assessment should include understanding what chemicals were applied to the stock feed, the rate and date of chemical application and the relevant WHP and ESI details from the chemical labels.

**Managing conventional stock feeds/By-product Vendor Declarations**

If you are considering using unconventional stockfeeds such as waste fruit, vegetable and fibre crops (which can be in the form of peel, pulp, pressings, stem and leaf material), extreme caution is required.

Crops wastes and plant processing by-products may seem like useful roughage sources in drought times; however, these unconventional types of stock feeds can contain chemical residues that could cause residue levels in livestock to exceed domestic or export limits.

Prior to purchasing these types of stock feeds, producers should request a By-product Vendor Declaration (BVD) from the supplier as part of the risk assessment on the suitability of feeding these materials to your livestock.

The BVD is intended to cover materials that have not been produced specifically for stockfeed (question four and the explanatory notes for the NVD (cattle) define ‘by-product’ stock feeds).

**Restricted Animal Material/Ruminant Feed Ban**

The feeding of meat and bone meal to ruminating animals has been linked to the spread of Bovine Spongiform Encephalopathy (BSE) in countries afflicted with BSE. In Australia, it is illegal to feed restricted animal material (RAM) to ruminants.

RAM material includes meat scraps, meat trimmings, offal, blood, bone, carcasses, food or food scraps that may have had contact with meat products (including used/untreated cooking oils, pizzas and breads) and food scraps or rubbish from bakeries, supermarkets, restaurants or cafes, food processing or manufacturing plants, private residences or rubbish dumps.
Managing residue risk factors during drought periods

Key points to remember to help manage risk factors during drought periods:

- use chemicals strictly in accordance with label directions
- ensure withholding periods (WHPs) and Export Slaughter Intervals (ESIs) are observed for stock feed produced on your property
- add a safety margin to WHPs and ESIs for lean stock and those that are losing weight.
- use caution with failed crops that are cut for hay or used for stock feed
- request a commodity vendor declaration (CVD) when purchasing in conventional stock feed
- use caution over decisions to use unconventional stockfeeds
- request a by-product vendor declaration when purchasing in unconventional stock feed.
- clarify the residue status of any suspect stock feeds or livestock with appropriate residue testing
- DO NOT feed RAM material
- fence off rubbish dumps and machinery storage areas to prevent livestock access to lead batteries, discarded oil and chemical containers of various sorts
- fully and accurately complete relevant National Vendor Declarations (NVDs).

Further information

For further information on managing chemical residue risks during drought, contact your livestock or veterinary advisor or local Animal Health Officer via PIRSA website at:
pir.sa.gov.au/biosecurity/animal_health/contact_us